

Module 11: Document Control

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GUIDANCE

To ensure that personnel are consistently performing their jobs in the right way, the organization must provide them with the proper tools. In the context of an EMS, the “tools” needed are correct and up-to-date procedures, instructions, and other documents. People in your organization probably use various documents (procedures, work instructions, forms, drawings, etc.) as they perform their duties and have some means to manage the documents. You also need to manage documents for your EMS. Without a way to manage these EMS documents, you can’t be sure that people are working with the right tools.

To ensure that everyone is working with the proper EMS documents, your organization should have a **procedure** that describes how such documents are controlled. Implementation of this procedure should ensure that EMS documents:

- can be located (we know where to find them),
- are periodically reviewed (we check to make sure they are still valid),
- are current versions and available where needed (we make sure the right people have access to them), and
- removed if they are obsolete (people don’t use the wrong documents by mistake).

Your document control procedure should address responsibility and authority for:

1. preparing documents,
2. making changes to them, and
3. keeping them up-to-date.

Hints for Good Document Control

- Don't make your document control procedure more complicated than it needs to be. While larger organizations often have complex processes for document control, smaller organizations can use simpler processes.
- Limiting distribution can make the job easier. Determine how many copies you really need and where they should be maintained for ease of access.
- If the people that need access to documents are connected to a local area network or have access to the organization's internal web site, consider using a paperless system. Such systems can facilitate control and revision of documents considerably. There also are a number of commercial software packages that can simplify the document control effort. To avoid edits to documents by unauthorized personnel, you can convert documents to a read-only format (such as pdf) before putting them on the network.
- Prepare a document control index that shows all of your EMS documents and the history of their revision (see **Form 11-2b**). Include this index in your EMS manual. Also, if multiple paper copies of documents are available at the facility, prepare a distribution list, showing who has each copy and where the copies are located.
- As your procedures or other documents are revised, highlight the changes (by underlining, boldface, etc.). This will make it easier for readers to find the changes.



TOOLS

Tool 11-1: Document Control Worksheet

Do we have an existing process for controlling EMS documents? If yes, does that process need to be revised? In what way?	
Who needs to be involved in this process within our organization?	
Who needs access to controlled copies of EMS documents? How do we ensure that they have access?	
How do we ensure that EMS documents are periodically reviewed and updated as necessary?	
Who has authority to generate new documents or modify existing ones? How is this process managed?	
How are users alerted to the existence of new EMS documents or revisions to existing ones?	
How do we ensure that obsolete documents are not used?	
Is our EMS document control process integrated with other organizational functions (such as quality)? If so, how do we ensure proper coordination between environmental and other functions?	
<i>Our next step on document control is to ...</i>	

Tool 11-2: Sample Procedure for Document Control

Purpose

To ensure effective operation of the EMS, [Your Facility's Name] will ensure that EMS documents are easy to find and are kept up-to-date.

Procedure

1. The EMS Coordinator maintains updated documents for the following outcomes, or results, of the functioning of the EMS environmental policy:
 - Environmental aspects and SEAs (*Module 3*)
 - Applicability of legal requirements to environmental aspects (*Module 4*). Copies of the regulations are maintained by the Environmental Management Representative (EMR).
 - Objectives, targets, and action plans for environmental management programs (*Modules 5 & 6*)
 - List of operational control procedures related to significant environmental aspects (*Module 12*)
 - Results of internal audits (*Module 17*)
 - Corrective and preventive actions taken (*Module 15*)
 - Management reviews (*Module 18*)
2. The EMS Coordinator is not responsible for maintaining records of environmental training and emergency response preparations; the operational control procedures themselves; or the New Purchase Approval Forms, the Design Approval Forms, or the Facility Expansion or Modification Plans. These records are maintained by the appropriate person or group.
3. The EMR or designee will control all EMS documents and records from items 1 and 2 using **Form 11-2a**: Document Control Form and **Form 11-2b**: Document Index Form.

Frequency

Manual review and revision on an annual basis.

Records

Maintained as outlined in this procedure.

Form 11-2a: Sample Document Control Form

Document	Who Will Use It	Permanent Location	Periodic Review Schedule/ Who	When Can Be Destroyed
			/	
			/	
			/	
			/	
			/	
			/	
			/	
			/	
			/	

Contact Person:

Date Completed:

Form 11-2b: Sample Document Index Form

Module #	Document	Revision Number (with Date and Initial of Responsible Party)					
		1	2	3	4	5	6
2	Environmental Policy						
All	EMS Manual						
3	Procedure: Identification of Environmental Aspects and Determination of Significance						
4	Procedure: Identification of Legal and Other Requirements						
5	Procedure: Setting Objectives & Targets						
6	Procedure: EMPs – Environmental Review for New Purchases, Processes, and Products						
8	Procedure: Training						
9	Procedure: Communication (internal and external)						
10	Procedure: EMS Documentation						
11	Procedure: Document Control						
12	Procedure: Development of Operational Controls						
13	Procedure: Emergency Preparedness and Response						
14	Procedure: Compliance Assessment						
15	Procedure: Corrective and Preventive Action						
16	Procedure: Records Management						
17	Procedure: EMS Audits						
18	Procedure: Management Reviews						
NA	Procedure(s) 12-X (list individually)						
17	EMS Audit Questionnaire (Example 17-1) and Gap Analysis Form (Example 1-1)						
NA	Other plans & documents related to above procedures (for example, SPCC, etc. – list separately)						
NA	Other forms and checklists (list separately under appropriate modules or here)						

NA indicates not applicable.